UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
9311 GROH ROAD
GROSSE ILE, MI 48138

MAY 18 2009

MEMORANDUM

SUBJECT: ACTION MEMORANDUM: Request for a Time-Critical Removal Action at the Plabell Rubber Manufacturing Plant Site, Toledo, Lucas County, Ohio (Site ID # B5PX)

FROM: Jon J. Gulch, On-Scene Coordinator JG
Oil Response Section

Michael A. Beslow, On-Scene Coordinator MB
Response Section 3

TO: Richard C. Karl, Director
Superfund Division

THRU: Jason H. El-Zein, Chief
Emergency Response Branch 1

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to $426,736 to conduct a time-critical removal action at the Plabell Rubber Manufacturing Plant Site (the Site) in Toledo, Ohio. The proposed response actions are necessary to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the Site. The City of Toledo-Division of Environmental Services (TDES) and U.S. EPA have documented the presence of hazardous substances existing at the Site, including flammable and toxic substances in drums and other containers inside Site structures.

The last known owner and operator of the Site is the St. Clair Rubber Corporation, which operated a rubber manufacturing business at the Site, but ceased operations in 2006. The business abandoned many drums and containers at the Site as described more fully in Section II. of this memorandum. The Site and the wastes it contains are not secured by a fence or other means, and exterior doors and windows are either open or unchained allowing unrestricted public access. Vandals continue to gain access to the Site.

The proposed response action will mitigate the threats posed by the hazardous substances found at the Site, by properly identifying, consolidating, packaging, removing and disposing of the hazardous substances. Additional Site activities will include security,

perimeter air monitoring, and decontamination of Site structures and surrounding Site property, as needed. This response action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(a)(1), to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances. The uncontrolled conditions of the hazardous substances present at the Site require that this action be classified as a time-critical removal action. The project will require approximately 35 working days to complete.

There are no nationally significant or precedent setting issues associated with the Site. The Site is not on the National Priorities List.

II. SITE CONDITIONS AND BACKGROUND

1. The CERCLIS identification number for this Site is OHN000510305.

2. Physical Location and Description of Site

The Site is located at 227 and 300-332 South St. Clair Street and 406 Williams Street, Toledo, Lucas County, Ohio 43602. An aerial photograph of the Site and the surrounding area is attached in Figure-1. The Site contains three buildings and a flammable storage shed totaling approximately 61,200 square feet. The Site occupies 13 city lots, approximately 3.028 acres in size, and is located in an area that is primarily residential with some industrial subdivisions. It is bounded immediately on the north and west by Swan Creek (a tributary of the Maumee River), the City of Toledo's Water Division Office and the Erie Street Market (a weekend, outdoor market); on the south by a United States Post Office; and on the east by several commercial and industrial properties and newly built residential condominiums. In addition, Fifth-Third Field, which is a 12,000 person capacity outdoor multi-use sports complex, is located within 0.25 miles of the Site. The Site is approximately 0.5 miles west of the Maumee River and approximately 0.25 miles from the downtown Toledo business district. According to area census data, there are six schools (at least one public school with an outdoor playground), 10 churches, and 386 homes within .75 miles of the Site (Comparative Demographic and Housing Report for Greater Neighborhood Census Track 38.02 Ohio 43602).

The geographical coordinates for the Site are 41° 38' 36" north latitude and -83° 32' 36" west longitude. As of September 11, 2008, there are approximately 32 55-gallon drums, 34 30-gallon drums, 67 5-gallon containers, 6 fiber boxes, and 400 laboratory containers of unknown waste abandoned in the buildings at the Site. In addition, there is laboratory-confirmed asbestos containing material in the buildings and in an underground storage tank. The surrounding soil is potentially contaminated with chemical constituents.

The Site is not completely fenced or otherwise enclosed or protected, and unsecured windows and doors provide unrestricted access to most areas of the Site. During the Site Assessment, evidence of a makeshift bed was observed in the flammable storage building. In addition, there was evidence of trespassing in all buildings at the Site.

3. Site Background

The Site is an abandoned rubber manufacturing facility that designed custom molding and specialized rubber products for a wide variety of applications. For 61 years, a broad variety of equipment for injection, transfer, compression molding, and roll covering was operated at the Site. In recent years, the facility also used REP Intelinject injection presses which permitted the facility to produce precision parts. The facility manufactured products for the automotive, refrigeration, appliance, steel, glass, marine, and medical industries. The manufactured products included: neoprene, ethylene propylene (EPDM), nitrile, silicone, urethane, viton, SBR, and natural rubber. The current owner of record and former operator of the Site, St. Clair Rubber Corporation, went out of business in 2006. The St. Clair Rubber Corporation was an employee owned corporation specifically formed to take over operations from the historic owner/operator, Plabell Rubber Products, Inc., which likewise went out of business in 1991.

In June of 1986, while the facility was still in operation, the Toledo Division of Environmental Services (TDES) inspected the facility and required the owners to conduct a Baseline Monitoring Report of Bld-1 and Bld-3. The inspection was based on reports of possible illegal discharge of waste material into the sewer system, which leads to the City of Toledo waste water treatment facility. The City of Toledo also collected samples from the floor drainage system on June 10 and 11, 1986. Results indicated elevated levels of oil and grease being discharged into the sewer system exceeding the City's compliance levels. The facility was notified of the findings and was asked to correct the situation. From 1986 to 2008, TDES had no information in the Site file indicating additional environmental issues.

On September 10, 2008, EPA and the Superfund Technical Assistance and Response Team (START) mobilized to the Site and conducted a Site Assessment, which included a site reconnaissance and drum/container inventory in all accessible buildings at the Site. To check for immediate hazards, START used a MultiRAE plus, a combination combustible gas meter and photoionization detector (MultiRAE PID) which monitors volatile organic compounds (VOCs), carbon monoxide, lower explosive limits (LEL) and oxygen in the air.

Bld-1 (Figure-2) is a one story building located at 300 South St. Clair Street. During the reconnaissance of Bld-1, START conducted an inventory of the drums and containers; documented label and marking information on the drums and

containers; and documented conditions of all drums and/or containers. START marked and inventoried approximately 130 drums and containers. The inventory included 32 55-gallon drums (steel and poly drums), 34 30-gallon drums (fiber and plastic), 67 5-gallon containers (steel and poly), and 6 fiber boxes. Approximately 400 small containers were located throughout Bld-1, including the research laboratory. A majority of the drums and containers did not have labels or markings and several had elevated VOCs based on MultiRAE PID readings. For inventory purposes, START marked the drums and containers starting at drum D-1 and finishing at drum D-130. Several of the drums were labeled as containing hydraulic oil, gear lubricant, and bis (dimethylthiocarbamoyl) disulfide (CAS 137-26-8). In addition, there were several copper dimethyl dithiocarbonate drums (marked D-66, D-75, and D-76) with the label "Hazardous and Harmful Stow Away from Foodstuffs." The majority of the 5-gallon containers were in poor to fair condition and several contained "flammable" labels. Over 350 small containers (1-gallon or less) were located inside four cabinets in the research laboratory. An additional 50 small containers were scattered throughout the remaining parts of Bld-1.

Bld-2 (Figure-3) is a six-story building located at 228 South St Clair Street. The building had signs of forced entry. Each floor was approximately 3,800 sq ft. The majority of the drums were located on floors 3 and 5. During the reconnaissance of building Bld-2, START conducted an inventory of the drums and containers; documented drum and container labels and markings; and documented the conditions of all drums and small containers which were located mainly on the 3rd and 5th floors. The inventory included a pallet of six fiber drums labeled as containing copper dimethyl dithiocarbonate and several pallets of approximately 20 50-pound bags of raw material. START inventoried the six drums on the 3rd floor and one drum on the 5th floor. All the drums contained similar material as Drum D-66, including the label of copper dimethyl dithiocarbonate and "Harmful Stow Away from Foodstuffs." The six drums on the 3rd floor were in good condition and wrapped in plastic and staged on a pallet. The drum on the 5th floor was not on a pallet but was in good condition.

The Flammable Storage Building (FSB) (Figure-3) is a small one story building located at 300 South St. Clair Street. During the reconnaissance of the FSB, START inventoried seven 55-gallon steel close-top drums (Drums D-81 through D-87), 16 marked 5-gallon containers (poly and steel), and nine small containers (1-gallon or less) marked as paint, paint thinner, paint stripper, and/or primer. The drums along the south wall were on spill pallets. The floor near the pallets had visible stains indicating past spills of unknown material or poor housekeeping. Inside the FSB, a vagrant had made a living area by erecting a make-shift bed using a thick sheet of plywood and several 5-gallon containers as footers. Evidence of trespassing was observed in all of the buildings. START segregated these containers and moved them to the center of the building to prevent exposure to the vagrants. During this site assessment, OSC Gulch

instructed the vagrant observed near Bld-2 not to enter the FSB and stay out of the building due to the presence of potential hazardous and flammable material.

Bld-3 (Figure-4), located at 227 South St Clair Street, is a two-story 10,000 sq ft property with a basement and a second floor. During the reconnaissance of Bld-3, START inventoried approximately 14 55-gallon drums (poly and steel), including four partially filled drums that contained an unknown oily material; one full 55-gallon steel drum, (drum D-104) containing an unknown oily material; one partially filled 55-gallon steel drum (drum D-117) with an UN 1897 label and marked "perchloroethylene." In addition, there were two 10-gallon containers and nine 5-gallon containers located near the front entrance of the facility. During this reconnaissance, START observed signs of potential Asbestos Containing Material (PACM) on the floor.

During the site assessment, START identified eight drums to be sampled for ignitibility and VOC analysis. The samples were taken from drums D-82, D-83, D-84, and D-87 located in FSB, from drums D-66 and D-79 located in Bld-1, and from drum D-117 located in Bld-3. No drum samples were identified for laboratory analysis from Bld-2 as the material was similar to drum D-66. START also identified additional drums and containers for on-site field hazard categorization (HazCAT) testing.

During the general reconnaissance of the area, a potential underground storage tank (UST) was observed directly south of Bld-2 by a loading dock. A sample from this UST was identified to be collected during the sampling activities.

All drum samples excluding D-66, D-79, and UST sample T-1 were analyzed for VOCs and flashpoint. Sample D-66 was analyzed for total metals and flashpoint; Sample D-79 was analyzed for pH; Sample T-1 sample was analyzed for flashpoint; and floor samples A-1 and A-2 were analyzed for bulk asbestos. START reviewed sample analytical data and supporting quality assurance/quality control (QA/QC) data provided by the laboratory Based on START QA/QC data validation, the data are acceptable for use as qualified.

Analytical results of the samples collected from the Site indicate both toxicity and ignitability characteristics. VOCs were the most prevalent contaminants detected in the samples collected by START. Analytical results from drum samples D-82, D-83, D-84, and D-87 had flashpoints of less than 140° Fahrenheit (F). The flashpoints were 54°F, 124°F, 86°F, and 95°F for drum samples D-82, D-83, D-84, and D-87, respectively. Sample D-82 had elevated levels of methyl ethyl ketone (2-butanone) at 820 milligrams per liter (mg/L) and toluene at 560 mg/L; sample D-83 had elevated levels of 2-butanone at 3,800 mg/L; sample D-84 had elevated levels of total xylene at 340,000 mg/L; sample D-87 had elevated levels of 2-butanone at 12,000 mg/L and tetrachloroethene at 190 mg/L; and sample D-117

had elevated levels of tetrachloroethene at 910,000 mg/L. Table 2 lists the sample analytical results for VOCs, pH, and flashpoint.

Sample D-66 was the only sample analyzed for total metals. The metal results, with the exception of lead, were at or below the specific method detection limits. The lead level was reported at180 milligram per kilogram (mg/kg). The two PACM samples from Bld-3 which were analyzed using polarized light microscopy (PLM) method, indicated that sample A-1 was 5 % to 10% amosite asbestos and sample A-2 was 10% to 15% chysotile asbestos.

4. Environmental Justice Analysis

According to the U.S. EPA Region 5 Superfund Environmental Justice Analysis, the average percentage of low income residents in Ohio is 30% and the average minority population is 16%. To meet the environmental justice (EJ) criteria, the area within one mile of the Site must have a population that is twice the state low income percentage or twice the state minority percentage. Within one mile of this Site, the percentage of the population that is low income is 73% and the percentage of the population that is minority is 57%. The EJ Analysis is attached to this memo as Attachment III. Therefore, this Site meets the Region's EJ criteria based on demographics, as identified in U.S. EPA Region 5's June 1998 policy document entitled *Interim Guidelines for Identifying and Addressing a Potential EJ Case.*

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions present at the Plabell Rubber Manufacturing Plant Site present an imminent and substantial threat to the public health, welfare, and the environment, based upon the factors set forth in Section 300.415(b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as amended, 40 C.F.R. Part 300. These factors include the following:

1. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants:

START sampling results indicate the presence of hazardous substances in several of the drum samples located in Bld-1 and the FSB. START also observed birds, rodents and other small animals inhabiting the Site. These animals can potentially serve as carriers for contaminants and result in potential exposure to the nearby human population.

The drum samples from drums D-82, D-83, D-84, D-87, and D-117 have elevated levels of one or more compounds such as 2-butanone, ethylbenzene, 4-methyl-2-pentanone, and PCE. The TCLP toxicity characteristic regulatory level for 2-butanone is 200 mg/L. Three FSB drum samples, D-82, D-83, and D-87 have

concentrations of 2-butanone at 820 mg/L, 3,800 mg/L and 12,000 mg/L, respectively. The PCE contamination levels in drum samples D-82 (140 mg/L), D-83 (190 mg/L) and D-117 (910,000 mg/L) exceed the TCLP regulatory criteria of 0.7 mg/L.

Inhalation of 2-butanone may cause irritation to the nose and throat. Concentrations above the threshold limit value (TLV) of 200 ppm may cause headache, dizziness, nausea, shortness of breath, and vomiting. Higher concentrations may cause central nervous system depression and unconsciousness. Ingestion may produce abdominal pain, nausea. Aspiration into lungs can produce severe lung damage and is a medical emergency.

Extended skin contact with perchloroethylene (PCE) may cause irritation. Human exposure to PCE by inhalation can affect the nervous system and can result in reversible mood and behavioral changes, impairment of coordination, or anesthetic effects. Exposure to PCE may cause dizziness, headache, sleepiness, confusion, and nausea. The Department of Health and Human Services has determined that PCE may reasonably be anticipated to be a carcinogen.

The friable material samples A-1 and A-2, collected from the floor of Bld-3, tested positive for amosite and chysotile asbestos material. Asbestos exposure has documented chronic effects. Asbestos fibers can easily enter the lungs and may cause diseases related to exposure to asbestos exposure and may not appear for several years later, possibly 15 to 40 years after exposure.

At the time of the Site assessment, there were several indications that the FSB and areas of Bld-1 were being consistently used by vagrants. The FSB contains four drums that are considered hazardous for ignitability and three drums that exhibit toxicity characteristics.

2. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release.

   The four buildings at the Site contain approximately 150 drums and containers, including 5-gallon steel and poly drums, 30-gallon fiber drums and 5-gallon steel and poly containers. In addition, there are approximately 350 small containers of unknown substances located in the laboratory of Bld-1. The Site also contains an UST located near Bld-2. There are several drums and containers without lids, and due to the condition of the drums and containers, may continue to deteriorate and cause a release. The drums, containers, and UST pose a continued threat of release to the environment, including soil and groundwater.

3. Threat of fire or explosion.

   Four drum samples (D-82, D-83, D-84, and D-87) show ignitable material with flashpoints lower than 140°F. Pursuant to 40 C.F.R. § 261.21(a) (1) and (2), these

materials are considered hazardous based on the Resource Conservation and Recovery Act (RCRA) characteristic of ignitability, which states:

(1) It is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume and has flash point less than 60 °C (140 °F), as determined by a Pensky-Martens Closed Cup Tester, using the test method specified in ASTM Standard D 93–79 or D 93–80 (incorporated by reference, see §260.11), or a Setaflash Closed Cup Tester, using the test method specified in ASTM Standard D 3278–78 (incorporated by reference, see §260.11). (2) It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard.

As described above, during the Site assessment of the FSB, START observed a living area apparently created by vagrants. Cigarette butts and matches were found inside the FSB. Several drums inside the FSB have ignitibility levels below 140°F. The lowest ignitibility level is 54°F as shown by drum sample D-82. The flashpoint of drum samples D-82, D-83, D-84, and D-87 are less than 140°F. These samples are classified as ignitable under 40 C.F.R. § 261.21. During hot and dry conditions on-site, smoking by vagrants in the FSB may cause a potential threat of fire or explosion.

4. The availability of other appropriate federal or state response mechanisms to respond to the release.

The City of Toledo requested the assistance of U.S. EPA in assessing the threats to human health and the environment and potential removal actions to abate those posed by the contaminants found at the Site. The City of Toledo has informed the Agency of its inability to respond to the actual or potential releases from the Site and has requested that U.S. EPA conduct a removal action.

IV. ENDANGERMENT DETERMINATION

Given the nature of the known and suspected hazardous substances found at the Site, and the potential exposure pathways described in Sections II and III of this memorandum, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS

1. The OSC proposes to undertake the following response actions to mitigate threats posed by the presence of hazardous substances at the Site:

   A. Develop and implement a site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;

B. Develop and implement a Site Work Plan and Site Security Plan;

C. Inventory and perform hazard characterization, in compliance with a site-specific Quality Assurance/Quality Control Plan, on all substances in containers, drums and tanks;

D. Investigate the potential for soil contamination on Site property;

E. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;

F. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at a RCRA-approved disposal facility, in accordance with U.S. EPA's Off-Site Rule, 40 C.F.R. § 300.440; and

G. Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the U.S. EPA OSC determines may pose an imminent and substantial endangerment to the public health, welfare, or the environment.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the criteria for removal actions listed in 40 C.F.R. § 300.415(l).

2. Applicable and Relevant and Appropriate Requirements

All applicable and relevant and appropriate requirements (ARARs) of Federal and state law will be complied with to the extent practicable. OSC Gulch sent a letter dated October 2, 2008, to Mike Cezele, OEPA, Northwest District Office, requesting that he search for any applicable state ARARs. To the extent practicable, U.S. EPA will comply with the ARARs identified in a timely manner.

3. Contribution to Remedial Performance

The threats posed by open and deteriorated drums and containers with substances considered hazardous are actionable under the criteria for removal actions listed in 40 C.F.R. § 300.415(b)(2). The proposed response actions are consistent with any long-term remedial actions which may be required. Elimination of hazardous substances, pollutants and contaminants that pose a substantial threat of release is expected to minimize substantial requirements for post-removal site controls.

4. Off-Site Rule

All hazardous substances, pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage and disposal shall be treated, stored, or

disposed at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 C.F.R. § 300.440.

5. Disproportionate Finding

The response actions described in this memorandum directly address the actual or threatened release of hazardous substances, pollutants, or contaminants at the Site which may pose an imminent and substantial endangerment to public health or welfare, or the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

6. Preservation of Information and Evidence

The removal action will be conducted in a manner to obtain and preserve information and evidence which may be of use in a civil or criminal investigation of the Site. Actions also will be coordinated with OEPA to facilitate an orderly transition to its planned Fiscal Year 2009 remedial activities. The project will require approximately 35 working days to complete.

7. ESTIMATED COSTS

The estimated costs to complete the above activities are summarized below. These activities will require an estimated 35 on-site working days to complete. More detailed cleanup contractor costs are presented in Attachment 1. The Removal Project Ceiling Estimate is as follows:

Extramural Costs

Regional Removal Allowance Costs:	$ 295,588.64

Total Cleanup Contractor Costs (This cost category includes estimates for: Emergency and Rapid Response Services (ERRS) contractor, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Includes a 15% contingency.)

Other Extramural Costs Not Funded from the Regional Allowance:

Total START, including multiplier costs:	$ 60,025.00
Subtotal, Extramural Costs:	$355,613.64
Extramural Costs Contingency: (20% of Subtotal, Extramural Costs)	$ 71,122.73
TOTAL, REMOVAL ACTION PROJECT CEILING:	$ 426,736.37

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed or no action will result in increased potential of the toxic and hazardous substances to release, thereby threatening the environment and the health and welfare of nearby residents and other persons who are in close proximity to the Site.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total EPA costs for this removal action based on full cost accounting practices that will be eligible for cost recovery are estimated to be $770,004.1

($426,736 + $45,920) + (62.91% x $472,656) = $770,004.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Plabell Rubber Manufacturing Plant Site located in Toledo, Lucas County, Ohio. This document has been developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site, which is summarized in Attachment II. Conditions at the Site meet the criteria for a time-critical removal action listed in 40 C.F.R. § 300.415(b)(2) and I recommend your approval of the proposed removal action.

---

[1] Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States right to cost recovery.

The total removal project ceiling, if approved, will be $426,736. Of this, an estimated $366,711 may be used for the cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: _____ DATE: 5-18-09

Richard C. Karl
Director, Superfund Division

DISAPPROVE: _____ DATE: _____

Richard C. Karl
Director, Superfund Division

Enforcement Addendum

Figures:

1 Site Location Map
2 Building-1 Inventory and Sample Map
3 Building-2 and FSB Inventory and Sample Map
4 Building-3 Inventory and Sample Map

Attachments:

1. Detailed Cleanup Contractor Cost Estimate
2. Administrative Record Index
3. Region 5 EJ Analysis
4. Independent Government Cost Estimate

cc: David Chung, U.S. EPA HQ, 5203-G
Michael Chezik, U.S. DOI, **w/o Enf. Addendum**
Kevin Clouse, OEPA, **w/o Enf. Addendum**
Central District Office
4675 HOMER OHIO LANE
GROVEPORT OH 43125
Richard Cordray, Ohio Department of Attorney General, **w/o Enf. Addendum**
30 E. Broad Street, 17th Floor
Columbus, OH 43215-3428

ENFORCEMENT ADDENDUM

PLABELL RUBBER MANUFACTURING PLANT SITE
227 and 300-332 SOUTH ST. CLAIR STREET AND 406 WILLIAMS STREET
TOLEDO, LUCAS COUNTY, OHIO

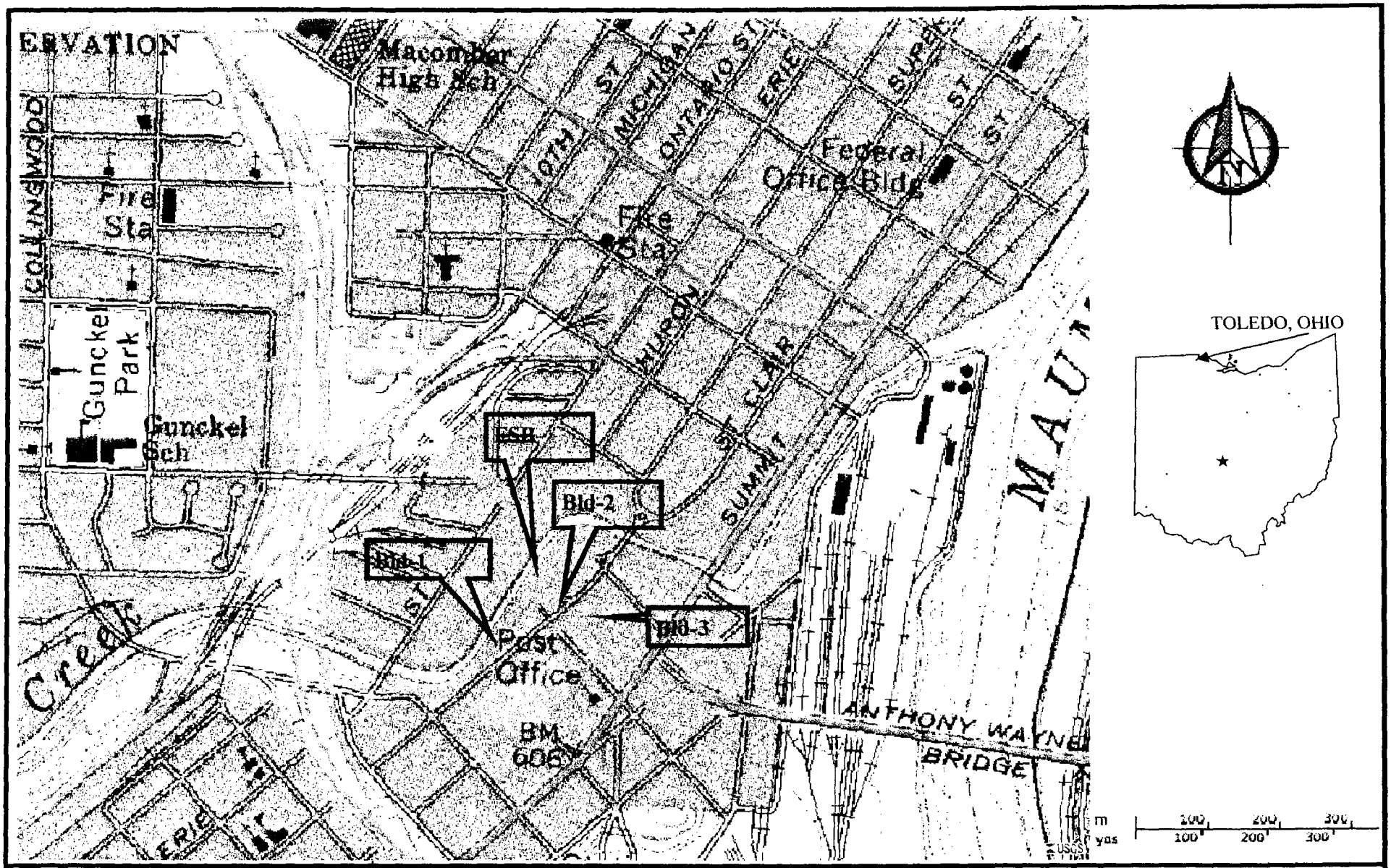
MAY 2009

(REDACTED 1 PAGE)

ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY

FIGURE 1

Plabell Rubber Manufacturing Plant Site Location Map



Source: Modified from Terra Server, USGS Topographic Map of Toledo, Ohio
Date 7/1/1980

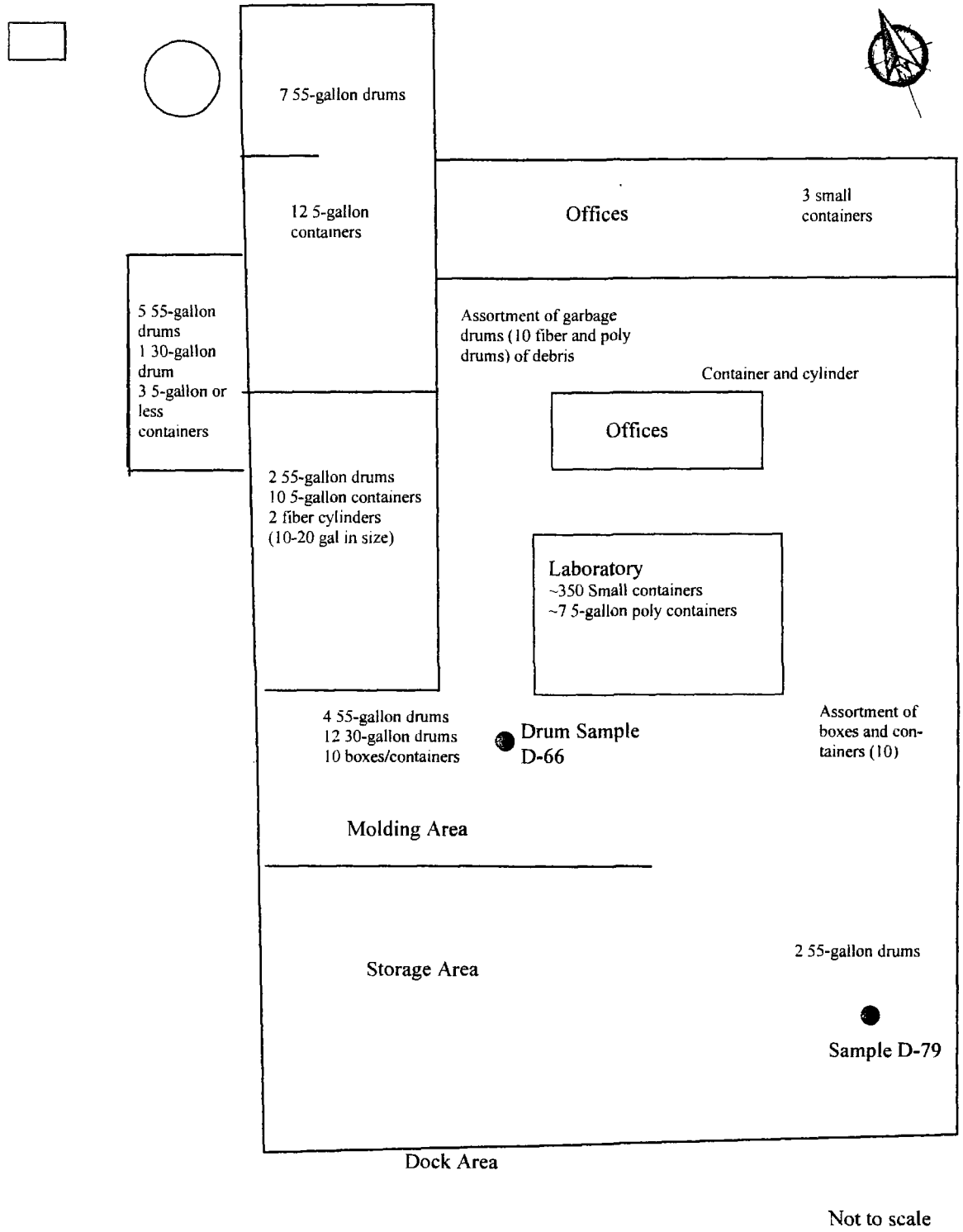
Legend
Bld-1– 300 South St. Clair Street
Bld-2 - 228 South St. Clair Street
Bld-3 - 227 South St. Clair Street
FSB - Flammable Storage Building

Figure 1
Site Location Map
Plabell Rubber Manufacturing Plant Site
Toledo, Lucas County, Ohio
TDD No.: S05-0808-004

STN Environmental

FIGURE 2

Building 1 Inventory and Sample Map



Legend

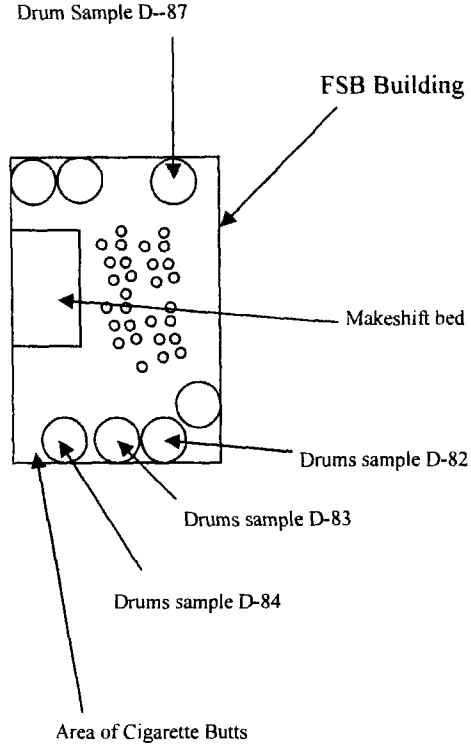
- Drums Sampled
- 6,000 gallon AST
- Storage Trailer

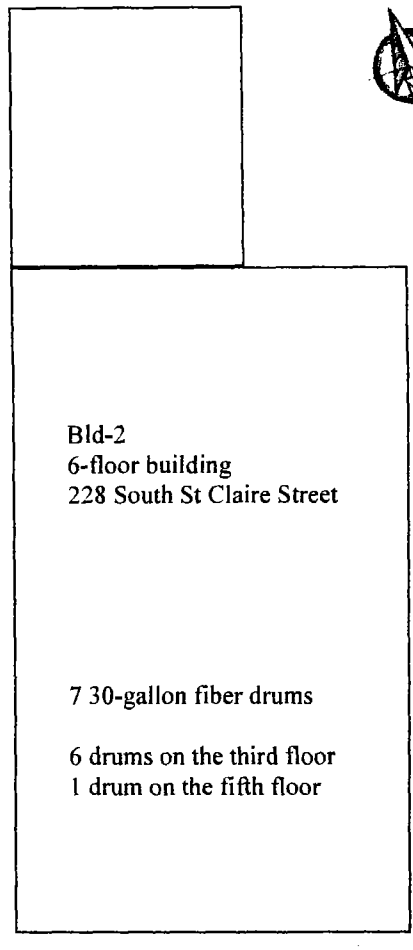
Figure 2
Building-1
Inventory and Sample Map
300-322 South St Clair Street

Plabell Rubber Manufacturing Plant Site
Toledo, Lucas County, Ohio
TDD No.: S05-0808-004

FIGURE 3

Building 2 and FSB Inventory and Sample Map





T-1

Bld-1

Not to scale

Legend

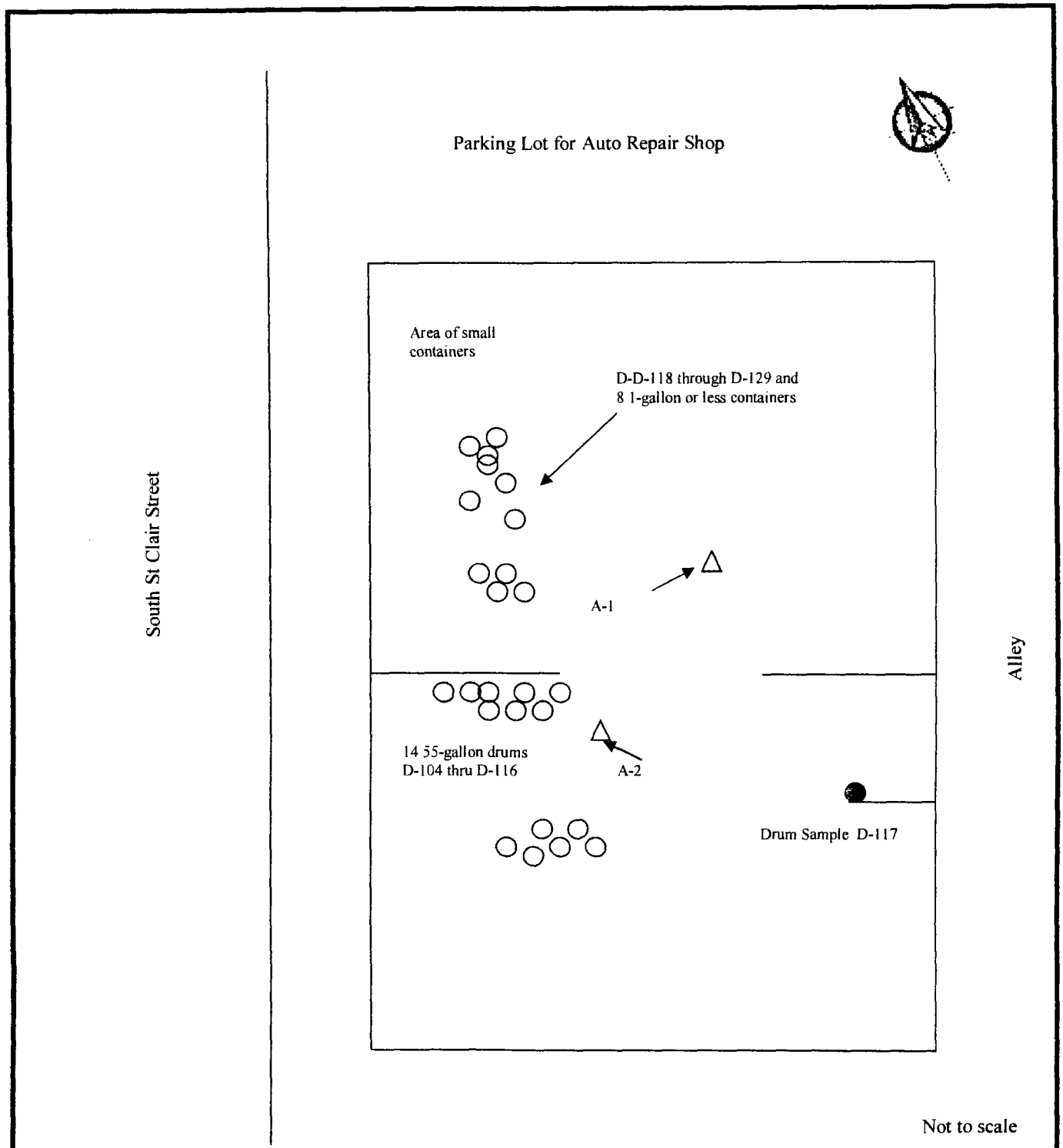
- Capped UST T-1 Sample Location
- 55-gallon drums
- 5-gallon or less containers

Figure 3
Building-2 and FSB
Inventory and Sample Map
228 South St Clair Street

Plabell Rubber Manufacturing Plant Site
Toledo, Lucas County, Ohio
TDD No.: S05-0808-004

FIGURE 4

Building 3 Inventory and Sample Map



Legend

- ○ 55-gallon drum
- ○ 10-gallon container
- ○ 5-gallon container
- △ Asbestos floor sample (A-1 and A-2)
- ● Drum sample Location

Figure 4
Building-3,Inventory and Sample Map
223 South St Clair Street

Plabell Rubber Manufacturing Plant Site
Toledo, Lucas County, Ohio
TDD No.:S05-0808-004

ATTACHMENT 1

DETAILED CLEANUP CONTRACTOR COST ESTIMATE

PLABELL RUBBER MANUFACTURING PLANT SITE
TOLEDO, LUCAS COUNTY OHIO
MAY 2009

The estimated cleanup contractor (ERRS) costs necessary to complete the removal action at the Plabell Rubber Manufacturing Plant Site are as follows:

Personnel & Equipment	$151,131.60
Materials	$ 21,152.00
Sampling and Analysis	$ 3,000.00
Transportation and Disposal	$ 81,750.00
Total	$257,033.60
Plus 15% Contingency	$ 38,555.04
Total ERRS Contractor Costs	$295,588.64

ATTACHMENT 2

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMEDIAL ACTION

ADMINISTRATIVE RECORD
FOR
PLABELL RUBBER MANUFACTURING PLANT SITE
TOLEDO, LUCAS COUNTY, OHIO

ORIGINAL
APRIL 2009

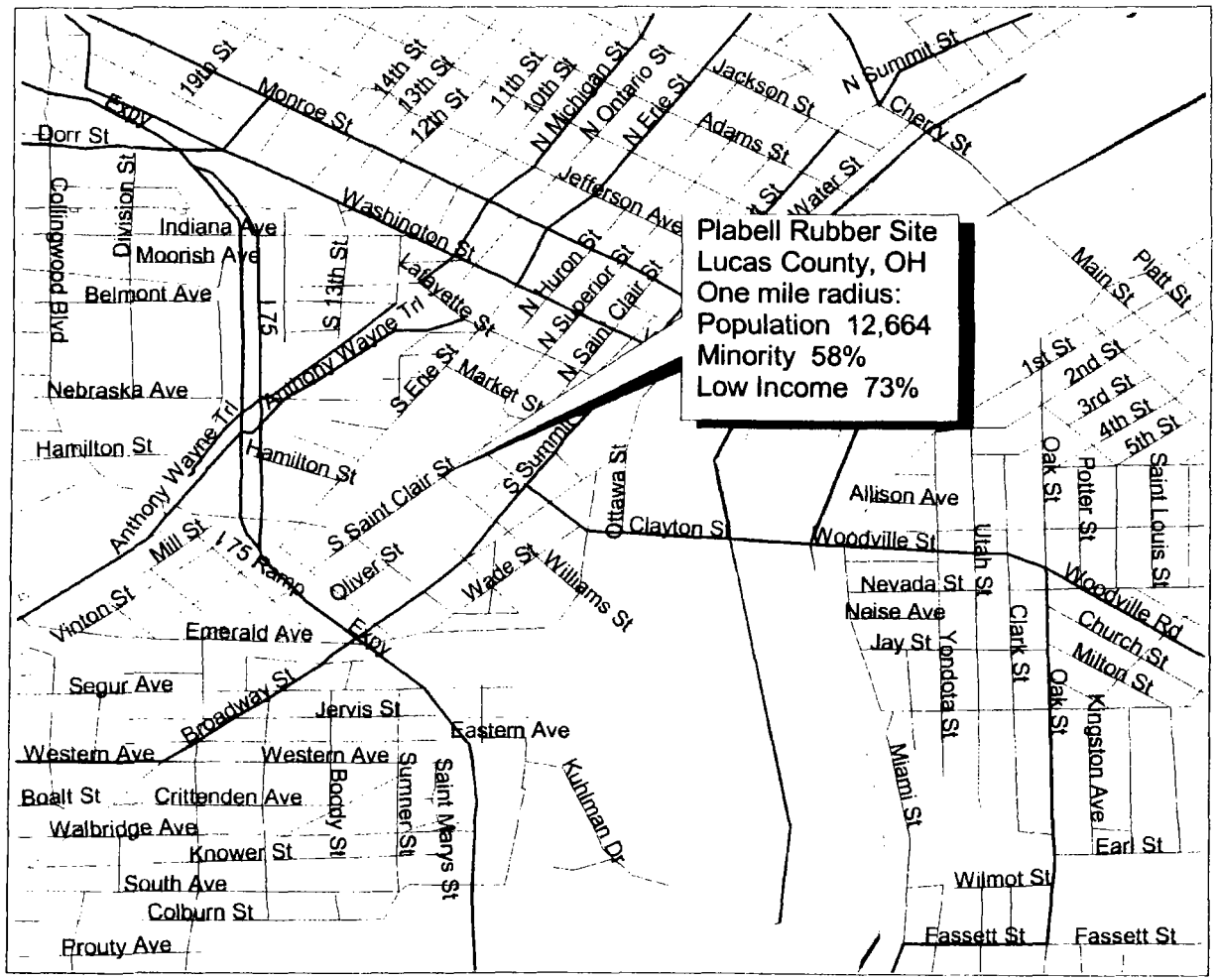
NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	07/28/08	Murphy, T., Toledo Dept. of Public Utilities	Durno, M., U.S. EPA	Letter re: Request for U.S. EPA Assistance at the bell Rubber Manufacturing Site	1
2	10/02/08	Gulch, J., U.S. EPA	Czeczele, M., Ohio EPA	Letter re: U.S. EPA's Request that Ohio EPA Identify all ARARS for the Plabell Rubber Manufacturing Plant Site	1
3	11/10/08	STN Environmental JV	U.S. EPA	Site Assessment Report for the Plabell Rubber Manufacturing Plant Site	43
4	00/00/00	Gulch, J., & M. Beslow, U.S. EPA	Zein, J., U.S. EPA	Action Memorandum: Request for a Time-Critical Removal Action at the Plabell Rubber Manufacturing Plant Site **(PENDING)**	

ATTACHMENT 3

REGION 5 ENVIRONMENTAL JUSTICE ANALYSIS

Region 5 Superfund EJ Analysis

Plabell Rubber Site Toledo, OH



State of Ohio averages:
Minority: 16%
Low Income: 30%

U.S. EPA Region 5
Environmental Justice Case Criteria
for State of Ohio

Minority: 32% or greater

Low Income: 60% or greater

Date of Map 10/3/08

Source of Map Census 2000 Database/
ArcView 3.0

ATTACHMENT 4

INDEPENDENT GOVERNMENT COST ESTIMATE

PLABELL RUBBER MANUFACTURING PLANT SITE
TOLEDO, LUCAS COUNTY, OHIO

MAY 2009

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

(REDACTED 4 PAGES)